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13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 JANNIE M. HARRIS,)
17 Plaintiff,) CIVIL NO. C-08-02775 JL
18 v.)
19 MICHAEL J. ASTRUE,)
20 Acting Commissioner of)
21 Social Security,)
22 Defendant.)
23
24 _____

25 STIPULATION AND ORDER FOR
26 EXTENSION

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28 IT IS HEREBY STIPULATED by the undersigned for the respective parties, subject to the
approval of the Court, that the Commissioner have a 21-day extension of time in which to file a response
to Plaintiff's Motion for Summary Judgment, up to and including January 21, 2009. The Commissioner
previously sought a 30-day extension of time up to and including December 31, 2008. This extension is
necessary because the Special Assistant United States Attorney for the Commissioner had an unexpected
increase in her work load when she was given an assignment to draft a memorandum for en banc review
of a Ninth Circuit case. The Commissioner notes that this assignment was the basis for his previous
request for an extension; however, the task proved to involve more unpredictable work than originally
anticipated. Additionally, due to events beyond her control, the Commissioner's attorney has had to
move her household with little notice in order to avoid personal harm. This combination of factors has
prevented the Commissioner's attorney from completing the brief in this matter within the extended

1 deadline.

2 Dated: December 31, 2008

3 /s/ Bess M. Brewer
4 (As authorized via email)
5 BESS M. BREWER
6 Attorney for Plaintiff

7 JOSEPH P. RUSSONIELLO
8 United States Attorney

9 Dated: December 31, 2008

10 By: /s/ Elizabeth Firer
11 ELIZABETH FIRER
12 Special Assistant United States Attorney

13 PURSUANT TO STIPULATION, IT IS SO ORDERED that Defendant Commissioner of Social
14 Security shall have up to and including January 21, 2009, to respond to Plaintiff's Motion for Summary
15 Judgment. nunc pro tunc.

16 Dated: April 20, 2009

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18 JAMES LARSON
19 United States Magistrate Judge